

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

Case No. 24-8297-BER

UNITED STATES OF AMERICA,

Plaintiff,

vs.

MARTHA JANE SCHOENFELD,

Defendant.

CRIMINAL COVER SHEET

1. Did this matter originate from a matter pending in the Miami Office of the United States Attorney's Office prior to July 20, 2008?

Yes      ☒ No

2. Did this matter originate from a matter pending in the Northern Region of the United States Attorney's Office (West Palm Beach Office) only prior to December 18, 2011?

Yes      ☒ No

3. Did this matter originate from a matter pending in the Fort Pierce Office of the United States Attorney's Office prior to August 8, 2014?

Yes      ☒ No

Respectfully submitted,

MARKENZY LAPOINTE  
UNITED STATES ATTORNEY

BY

  
JOHN C. McMILLAN  
ASSISTANT UNITED STATES ATTORNEY  
Admin. No. A5500228  
500 S. Australian Ave., Suite 400  
West Palm Beach, FL 33401  
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John.mcmillan@usdoj.gov

AO 91 (Rev. 08/09) Criminal Complaint

UNITED STATES DISTRICT COURT

for the  
Southern District of Florida

**SEALED**

United States of America  
v.  
MARTHA JANE SCHOENFELD

Case No. 24-8297-BER

Defendant(s)

FILED BY TM D.C.

**Jun 26, 2024**

ANGELA E. NOBLE  
CLERK U.S. DIST. CT.  
S. D. OF FLA. - WPB

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 6, 2024 in the county of Palm Beach in the  
Southern District of Florida, the defendant(s) violated:

*Code Section*  
18 U.S.C. § 844(e)  
18 U.S.C. § 879(a)(1)

*Offense Description*  
Knowingly Making a Telephonic Bomb Threat; and  
Threatening a Former President of the United States

This criminal complaint is based on these facts:

Please see attached Affidavit

☒ Continued on the attached sheet.



Complainant's signature

Brenden Clements, Special Agt, U.S. Secret Service

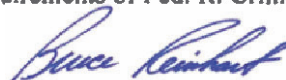
Printed name and title

Subscribed and sworn to before me in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone (Facetime).

Digitally signed by Bruce  
Reinhart

Date: 2024.06.26 13:27:22 -04'00'

Date: \_\_\_\_\_



Judge's signature

City and state: West Palm Beach, Florida

Bruce Reinhart, U.S. Magistrate Judge

Printed name and title

**AFFIDAVIT**  
**Case No. 24-8297-BER**

Your affiant, Brenden Clements, first being duly sworn, does hereby depose and state as follows:

1. I am a Special Agent (SA) of the United States Secret Service (USSS), and I have been so employed since July 2022. I am currently assigned as a Criminal Investigator to the West Palm Beach Resident Office. As part of my assignment, I investigate both financial and protection-based crimes. I have received extensive training as a Special Agent in the investigation of counterfeit currency, identity theft, bank fraud, and access device fraud, as well as in USSS protection-based law enforcement and investigation of threatening statements and/or actions toward USSS protected persons and USSS secured grounds and buildings at both the Federal Law Enforcement Training Center (FLETC) in Georgia and the James J. Rowley Training Center in Maryland. I am an investigative or law enforcement officer of the United States, in that I am empowered by law to conduct investigations and to make arrests for criminal offenses, under the authority of Title 18, United States Code, Section 3056.

2. As a result of my training and experience, I am aware that Title 18, United States Code, Section 844(e) provides that:

Whoever, through the use of the mail, telephone, telegraph, or other instrument of interstate or foreign commerce, or in or affecting interstate or foreign commerce, willfully makes any threat, or maliciously conveys false information knowing the same to be false, concerning an attempt or alleged attempt being made, or to be made, to kill, injure, or intimidate any individual or unlawfully to damage or destroy any building, vehicle, or other real or personal property by means of fire or an explosive shall be imprisoned for not more than 10 years or fined under this title, or both.

3. As a result of my training and experience, I am aware that Title 18, United States Code, Section 879(a)(1) provides that:

(a) Whoever knowingly and willfully threatens to kill, kidnap, or inflict bodily harm upon -- (1) a former President or a member of the immediate family of a former President. . . . who is protected by the Secret Service as provided by law, shall be fined under this title or imprisoned not more than three years, or both.

I am further aware that at all times materials hereto, Donald J. Trump, is and was a former President of the United States (FPOTUS), who is protected by the Secret Service as provided by law. I am further aware that in *United States v. Evans*, 476 F.3d 1176, 1180 (11th Cir. 2007), the Eleventh Circuit Court of Appeals held that “[t]elephones and cellular telephones are instrumentalities of interstate commerce” even when used purely for an intrastate communication.

4. This affidavit is submitted in support of a criminal complaint against Martha Jane SCHOENFELD (SCHOENFELD) charging that she did knowingly and willfully through the use of the telephone make threats, or maliciously convey false information knowing the same to be false, concerning an attempt or alleged attempt being made, or to be made, to kill, injure, or intimidate any individual or unlawfully to damage or destroy any building, vehicle, or other real or personal property by means of fire or an explosive to kill or inflict bodily harm upon the person of another, specifically a former President of the United States, in violation of Title 18, United States Code, Sections 844(e), and 879(a)(1).

5. The facts articulated in this affidavit are based upon my personal knowledge, as well as knowledge, information, and documentation that I obtained from others, including other officers working in their official capacity. Because this affidavit is submitted for the limited purpose of establishing probable cause for a criminal complaint, it does not contain all of the

information known to me concerning this investigation. Instead, it contains only those facts necessary to establish probable cause.

6. On June 6, 2024, a cellular phone subscribed to SCHOENFELD called Trump International Golf Club in Palm Beach County, Southern District of Florida. The number 631-871-0513 was captured and given to the USSS. SCHOENFELD left a voicemail that included, "...There is a bomb I left on the site, so hopefully you will get everyone evacuated except for Trump...". After the voicemail was received and listened to, an immediate communication of the threat was relayed to USSS.

7. Investigation conducted by the USSS determined that 631-871-0513 was, at all times material hereto, subscribed to by Martha Jane SCHOENFELD, whose listed address was in Boca Raton, Florida. On June 6, 2024, at approximately 1:45 p.m., Special Agent Brenden Clements of the USSS West Palm Beach Resident Office responded to the home of Martha Jane SCHOENFELD located at 250 NW 67th Street, Boca Raton, Palm Beach County, Southern District of Florida, to conduct a voluntary, non-custodial interview SCHOENFELD. Upon arrival, your affiant conducted an interview inside the home, certain parts of the interview were captured on a Boca Raton Police Department Detectives body worn camera. SA Clements identified himself as a U.S. Secret Service Special Agent, and asked SCHOENFELD if she knew anything about threats made to Trump International Golf Club (TIGC), to which she initially responded in the negative. SA Clements asked SCHOENFELD if she had her phone with her which she then voluntarily produced. SA Clements then asked what SCHOENFELD's phone number was, to which SCHOENFELD responded 631-871-0513, which matched the number that called TIGC and made the bomb threat. SA Clements then explained that her phone number matched the number that called and said there was a bomb at TIGC for FPOTUS Trump. Once again, SCHOENFELD

denied knowing anything. SA Clements then told SCHOENFELD that they will most likely conduct a phone call trace and try to locate where the call originated from. SCHOENFELD then admitted, on body camera footage provided by Boca Raton Police Department, that she had placed the bomb threat call to TIGC. Law enforcement then departed the interview scene, and SCHOENFELD's presence, to consult with supervisory authorities.

8. Shortly after departing SCHOENFELD's residence, on June 6, 2024, SA Clements received notifications from the Protective Intelligence Operations Center Of the United States Secret Service that another bomb threat call had been placed on June 6, 2024, this time to Trump International Hotel in Las Vegas located at 2000 N Fashion Show Drive, Las Vegas, District of Nevada. That phone call originated from the same phone number as was used by SCHOENFELD's in her bomb threat to TIGC. SA Clements contacted SCHOENFELD telephonically about the Las Vegas threat. Again, SCHOENFELD initially denied making any other threats, but eventually admitted that she had placed a bomb threat call using the same number (631-871-0513) to Trump International Hotel in Las Vegas, and additionally to Senator Marco Rubio's Office, around the same time she placed the call to TIGC.

WHEREFORE, on the basis of the foregoing, your affiant respectfully submits that

probable cause exists to charge defendant Martha Jane SCHOENFELD with having committed violations of 18, United States Code, Sections 844(e) and 879(a)(1).

FURTHER YOUR AFFIANT SAYETH NAUGHT.



Brenden Clements  
Special Agent  
United States Secret Service

SWORN AND ATTESTED TO ME BY  
APPLICANT VIA TELEPHONE (FACETIME)  
PURSUANT TO FED. R. CRIM. P. 4(d) AND 4.1  
THIS \_\_\_\_ DAY OF JUNE, 2024.



Digitally signed by  
Bruce Reinhart  
Date: 2024.06.26  
13:27:46 -04'00'

**BRUCE E. REINHART**  
**UNITED STATES MAGISTRATE JUDGE**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: Martha Jane SCHOENFELD

Case No: 24-8297-BER

Count #: 1

Knowingly Making a Telephonic Bomb Threat

Title 18, United States Code, Section 844(e)

- \* Max. Term of Imprisonment: 10 years' imprisonment;
- \* Mandatory Min. Term of Imprisonment (if applicable): not applicable
- \* Max. Supervised Release: 3 years
- \* Max. Fine: \$250,000
- \* Special Assessment: \$100.00

Count #: 2

Threatening a Former President of the United States

Title 18, United States Code, Section 879(a)(1)

- \* Max. Term of Imprisonment: 10 years' imprisonment;
- \* Mandatory Min. Term of Imprisonment (if applicable): not applicable
- \* Max. Supervised Release: 3 years
- \* Max. Fine: \$250,000
- \* Special Assessment: \$100.00

\*Refers only to possible term of incarceration, supervised release and fines. It does not include restitution, special assessments, parole terms, or forfeitures that may be applicable.